

Presentment Date and Time: September 6, 2018 at 4:00 p.m.

Objection Deadline: September 5, 2018 at 10:00 a.m.

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*Counsel to the Plan Administrator
for the Gawker Entities*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER BETWEEN
THE PLAN ADMINISTRATOR, ON BEHALF OF THE GAWKER ENTITIES,
AND CHARLES C. JOHNSON AND GOT NEWS, LLC REGARDING
RESOLUTION OF REMAINING GOT NEWS/JOHNSON CLAIMS**

PLEASE TAKE NOTICE that, William D. Holden, as the plan administrator (the “Plan Administrator”) for Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”), and Gawker Hungary Kft. (“Gawker Hungary,” and together with Gawker Media and GMGI, the “Gawker Entities”), in the above-captioned chapter 11 cases (the “Cases”) and Got News LLC (“Got News”) and Charles Johnson (“Mr. Johnson,” and together with Got News, the “Claimants”) (each individually, a “Party,”

¹ The last four digits of the taxpayer identification number of the Gawker Entities are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). The Gawker Entities’ mailing addresses are c/o The Boathouse Group, LLC, 44 Lynden Street, Rye, NY 10580, Attn: William D. Holden.

and all collectively, the “Parties”) by and through their respective counsel, desire to enter into this stipulation for an agreed upon order (the “Stipulation and Order”) regarding the Remaining Got News/Johnson Claims.²

PLEASE TAKE FURTHER NOTICE that, the Parties will present the *Stipulation and Order Between the Plan Administrator, on Behalf of the Gawker Entities, And Charles C. Johnson And Got News, LLC Regarding Resolution of Remaining Got News/Johnson Claims*, substantially in the form attached hereto as **Exhibit A**, for signature to the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York (the “Court”), Courtroom 723, One Bowling Green, New York, NY 10004 on **September 6, 2018 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that, responses or objections (the “Objections”) to the Stipulation and Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), shall set forth the basis for the response or objection, a blackline showing the changes to the Stipulation and Order and the specific grounds for such changes, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and served so as to be actually received no later than **September 5, 2018 at 10:00 a.m. (prevailing Eastern Time)** (the “Objection

² Capitalized terms not defined herein shall have the same meaning ascribed to them in the Stipulation and Order.

Deadline”), upon (i) the Plan Administrator for the Gawker Entities, 44 Lynden Street, Rye, New York 10580, Attn: William D. Holden (wholden@boathouse-LLC.com); (ii) counsel to the Plan Administrator for the Gawker Entities, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, New York 10036, Attn: Gregg M. Galardi, Esq. (gregg.galardi@ropesgray.com); (iii) counsel to Charles C. Johnson and Got News LLC, Randazza Legal Group, PLLC, 100 Pearl Street, 14th Floor, Hartford, Connecticut 06103, Attn: Jay M. Wolman, Esq. (ecf@randazza.com); (iv) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Greg Zipes, Esq. and Susan Arbeit, Esq. ; (v) counsel for the IRS, United States Attorney’s Office Southern District of New York, 86 Chambers Street, 3rd Floor, New York, New York 10007, Attn: Andrew E. Krause, Esq.; and (vi) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE that, if no objections are timely filed and received by the Objection Deadline, the relief requested in the Stipulation and Order may be granted without further notice or a hearing. If an objection is filed, you will be notified of a hearing to consider the requested relief.

[Text continues on the next page]

PLEASE TAKE FURTHER NOTICE that, a copy of the Stipulation and Order may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://cases.primeclerk.com/gawker>. You may also obtain copies of any pleadings by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: August 16, 2018
New York, New York

/s/ Gregg M. Galardi
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